UNITED STATES DISTRICT COURT FOR THE DISTRICT OF RHODE ISLAND

TANER MUNSIF and ELIZABETH M. : RYAN, individually, and on behalf of :

other similarly situated individuals,

Plaintiffs :

:

v. : C.A. NO.: 1:16-cv-00387-M-LDA

UTGR, INC., d/b/a LINCOLN PARK,

alias, :

Defendant :

:

CLASS COUNSEL'S APPLICATION FOR ATTORNEYS' FEES

Now come the Lead Plaintiffs Taner Munsif and Elizabeth M. Ryan, individually and on behalf of Opt-in Plaintiffs in the above-captioned collective action, and hereby move this Honorable Court for an award of counsel fees of \$267,558.81 plus costs of \$955.44 or a total of \$268,514.25, of which \$100,000.00 will be paid by Defendant per the Proposed Settlement Agreement and \$168,514.25 will be paid by Plaintiffs from the common fund of \$684,057.02 via a twenty-five percent (25%) reduction pro-rata, for services rendered by Class Counsel in this action, all of which is payable from the total gross settlement of \$784,057.02.

As grounds therefore and in support thereof, Plaintiffs rely on their Memorandum of Law and Affidavits in support filed simultaneously herewith.

WHEREFORE, Plaintiffs pray that this Honorable Court grant Class Counsel's Application and award Class Counsel the requested counsel fees and costs incurred in achieving a successful result as set forth above.

Plaintiffs,

By their attorneys,

SINAPI LAW ASSOCIATES, LTD.

Dated: March 5, 2019 /s/ Richard A. Sinapi

Richard A. Sinapi, Esq. (#2977)

2374 Post Road, Suite 201 Warwick, RI 02886

Phone: (401) 739-9690; FAX: (401) 739-9040

Email: ras@sinapilaw.com

CERTIFICATION

Michael D. Chittick, Esq. Adler Pollock & Sheehan, P.C. One Citizens Plaza, 8th Floor Providence, RI 02903 Mchittick@apslaw.com

I hereby certify that on **March 5, 2019**, a true copy of the within was filed electronically via the Court's CM/ECF System. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system and the filing is available for viewing and downloading from the Court's CM/ECF System. Service on the counsel who has communicated that they will be represented Defendant listed above has been effectuated by electronic means.

I also certify that on **March 5, 2019,** a true copy of the within document was served electronically via email to all Plaintiffs in this action

/s/ Richard A. Sinapi